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**COUNTY OF INYO
WATER DEPARTMENT**

November 18, 2010

TO: Mary Scruggs, Department of Water Resources

FROM: Bob Harrington, Inyo County Water Director

SUBJECT: Additional comments on draft CASGEM Monitoring Entity Reporting and Groundwater Monitoring Guidelines

Please accept these additional comments to those I submitted on November 18. Please clarify in the Monitoring Entity Reporting document (1) the definition of a data gap, (2) how data gaps are identified, and at what point in the process prospective monitoring entities provide information as to the nature of data gaps within their area, and (3) how local agencies retract a notification of interest in becoming a monitoring entity.

Definition. The document indicates that a data gap is a portion of a basin not included in any monitoring plans submitted to DWR. The document also states that data gaps are areas that lack the necessary density of monitoring wells. It is unclear whether an area that has insufficient well coverage, but is included in a monitoring plan, would be considered a data gap. Additionally, the section defining refers to lack of groundwater use, lack of access, or jurisdictional issues as also being relevant to data gaps. These issues reflect on some of the comments I previously submitted, and I would like to understand how I should deal with these issues in any monitoring area that the County assumes responsibility for.

Identification of data gaps. The process for identifying data gaps is unclear. Are local agencies expected to identify data gaps in their regions when they notify DWR of interest in becoming a monitoring entity (before January 1, 2011), or will DWR to identify data gaps after January 1, 2011 when it has reviewed all notifications, and then inform agencies of data gaps within their jurisdiction?

Retraction. Because of the newness of this program and the short timelines we are presently working under, it seems likely that on January 1, 2010, we will still have some uncertainties about the feasibility of monitoring certain basins in Inyo County. In the event that we identify the County as a potential monitoring entity for a basin in the County, and during the development of monitoring plans, it becomes

apparent that it is infeasible to monitor part of a basin, how does the County retract its notification of interest in monitoring?

Thank you for consideration of these late comments.